

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RICKEY ROGERS	:	
	:	
Plaintiff	:	CIVIL ACTION
	:	NO. 3:19-CV-30103-KAR
v.	:	
	:	
STATE AUTOMOBILE CORPORATION	:	
D/B/A STATE AUTO INSURANCE COMPANIES	:	
	:	
Defendant	:	SEPTEMBER 12, 2019

**REQUEST FOR EXTENSION OF TIME TO PLEAD**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) the Defendant, Patrons Mutual Insurance Company of Connecticut, incorrectly named as “State Automobile Corporation d/b/a State Auto Insurance Companies,” (hereinafter the “Defendant”) hereby moves for a 21-day extension of time, up to and including October 10, 2019, in which to file a responsive pleading to the Plaintiff’s complaint. This is the Defendant’s first request for extension of time to file a responsive pleading to the Complaint. The responsive pleading is currently due September 19, 2019, and thus this Request is made prior to the expiration of the original deadline. *See* F.R.C.P. 6(b)(1). Defendant seeks the requested extension because it requires additional time to formulate an appropriate response to the complaint, including any all applicable defenses.

The Defendant contacted the Pro Se Plaintiff inquiring whether he consented to the requested extension. Although the Defendant received a response from Plaintiff, it is unclear from the Plaintiff’s response whether he consents or objects to the request. This case has not

**ORAL ARGUMENT NOT REQUESTED**

been assigned for trial.

WHEREFORE, the Defendant respectfully requests that its Request for Extension of Time be granted.

DEFENDANT,  
PATRONS MUTUAL INSURANCE COMPANY OF  
CONNECTICUT INCORRECTLY NAMED  
STATE AUTOMOBILE CORPORATION  
D/B/A STATE AUTO INSURANCE COMPANIES,

/s/ Deborah Etlinger (565222)  
Deborah Etlinger (565222)  
Wolf, Horowitz & Etlinger, LLC  
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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been sent, via U.S. Mail, postage prepaid, to the following party on September 12, 2019.

Rickey Rogers  
47 Gatewood Road  
Springfield, MA 01119  
Pro Se Plaintiff

/s/ Deborah Etlinger (565222)  
Deborah Etlinger

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